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FEDERAL COMMUNICATIONS COMMISSION
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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.

In The Matter Of)
)
Advanced Television Systems) MM Docket No. 87-268
and Their Impact Upon the)
Existing Television Broadcast)
Service)

To: The Commission

COMMENTS ON EX PARTE FILINGS ADDRESSING DIGITAL TV ALLOTMENTS

Entravision Holdings, LLC ("Entravision"), the licensee of Station KNVO(TV), McAllen, Texas, by its attorneys, hereby submits its Comments on the ex parte submissions presented by the Association for Maximum Service Television, Inc. ("MSTV") on November 20, 1997¹ and the Association of Local Television Stations, Inc. ("ALTV") on November 25, 1997. These Comments are filed in response to the FCC's Public Notice issued on December 2, 1997 inviting Comments on the ex parte submissions presented by MSTV and ALTV. In support thereof, Entravision states as follows.

1. The MSTV has provided the Commission with a valuable service by having undertaken the research to establish that the allotment of adjacent DTV channels, not spaced at least 80 to 100 km apart, will result in serious interference to the stations.

¹ MSTV's pleading was styled, "Ex Parte Submission Based on New Technical Discoveries to Help the Commission Improve the DTV Table of Allotments/Assignments Submitted by The Association for Maximum Service Television, Inc. and Other Broadcasters."

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This is a serious issue and of concern to Entravision, whose station has been allotted, in the FCC's DTV Table of Allotments, Channel 30 while Station KGTB-TV, Harlingen, Texas, has been allotted Channel 31, the immediately adjacent channel.

2. The potential for interference has been brought home to Entravision by a review of the MSTV pleading. According to the MSTV's research, Station KNVO(TV) can expect only a 68% replication of its signal. Until now, Entravision had been relying on the Commission's Sixth Report and Order in MM Docket No. 87-268, FCC 97-115, released April 21, 1997, in which the Commission had indicated that there would be a 100% replication of signal. The disparity between the MSTV's 68% replication figure and the Commission's 100% figure is significant and must be addressed.

3. Based on our review of the MSTV documents, including the research reports provided, we submit that MSTV has, owing to the issuance of OET Bulletin No. 69 and independent laboratory testing, come upon an issue that cannot be ignored. The impact of an adjacent DTV station on another one appears to have been proven by the work undertaken by the Advanced Television Technology Center, Inc. and JTCAB Ad Hoc Group on DTV Planning Parameters. Very simply, this is a matter not to be ignored and the Commission must take every action necessary to eliminate DTV-to-DTV adjacent channel allotments. As MSTV has established,

adjacent channel allotments can be eliminated while preserving a viable table of allotments.

4. In the case of the Harlingen-Weslaco-Brownsville-McAllen, Texas television market, the MSTV has come up with, in Entravision's opinion, a simple and satisfactory response to the adjacent DTV allotment problem. It has proposed that Station KGBT-TV, Harlingen, Texas, receive Channel 32, rather than Channel 31, as its DTV allotment, while Station KNVO(TV) remains with a Channel 30 allotment. According to the MSTV, the result of this alteration to the DTV Table will be to provide Station KNVO(TV) with a 99.4% replication and Station KGBT-TV with a 98.2% replication. This result provides the continued level of service that the Stations and the viewing public are entitled to.

5. The MSTV research on the impact of DTV-to-DTV adjacent stations is a matter that calls out for being addressed. It has provided the Commission and broadcasters with information on a potential interference problem. The time to respond to that problem is now, before the interfering stations have been constructed and resolution of the matter would be difficult, if not impossible. As a result, the Commission should take all actions necessary to avoid adjacent channel DTV allotments and, in the case of Station KGBT-TV, Harlingen, Texas, it must change that Station's DTV allotment from Channel 31 to Channel 32.

6. As for the ALTV document, it addresses another serious matter that has arisen in connection with the DTV Table of Allotments. There is present an obvious and significant disparity in the power levels provided for existing UHF stations as opposed to VHF stations that are receiving UHF DTV allotments. This should not be ignored and existing UHF broadcasters are entitled to far greater comparability than they have received. ALTV is entirely correct in proposing a mechanism for increasing the signal strength of UHF broadcasters and the Commission should respond to this with rules establishing power levels that achieve such a result while not producing impermissible interference to other stations, especially in urban areas.

Respectfully submitted,

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Dated: December 17, 1997